



Neil L. Postrygacz

December 2, 2021

VIA ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square, Room 240
New York, NY 10007

***RE: SingularDTV GmbH v. Zachary LeBeau and Kimberly Jackson
No. 1:21-CV-10130-VEC***

Dear Judge Caproni:

Pursuant to this Court's Order dated December 1, 2021, I e-filed the below proposed language on December 1 at 07:57 p.m. under "Proposed Order." The parties met and conferred but were unable to agree on the appropriate proposed language to submit to this Court

Plaintiff, by their counsel, proposed language that went well beyond the Court's Order. For example, Plaintiff requests access to the email accounts of ten (10) individuals, eight (8) of whom are past employees or contractors of the GmbH.

Proposed Language:

Defendants are ORDERED to provide, or cause to be provided, by December 2, 2021 at 10:00 a.m., to Plaintiff, its current employees, and current contractors' full access to their SingularDTV GmbH email accounts (meaning, by way of example, inboxes, sent e-mails and all other e-mail folders, folder structures, calendars or calendar entries, task lists, and/or all associated attachments and files);

It is FURTHER ORDERED that Defendants shall not access the email accounts of the GmbH, its employees, and contractors; and

It is FURTHER ORDERED that Plaintiff, its employees and contractors shall not access the email accounts of Defendants, SingularDTV, LLC, its employees and contractors.



Dated: December 2, 2021
New York, New York

Respectfully submitted,

NEIL L. POSTRYGACZ
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